

Selby District Core Strategy

Addendum to Regulation 30 (e) Statement

March 2012



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1. Introduction

- 1.1 The Council published a Regulation 30 Statement (Summary of Representations Received) which was submitted with the Submission Draft Core Strategy in May 2011.
- 1.2 This report summarises the number of responses to the consultation on Proposed Changes to the Core Strategy and highlights the key issues which were raised and which will be examined by the Inspector at the forthcoming reconvened Examination in Public (EIP).

2. Background

- 2.1 The Core Strategy Examination into the soundness and legal compliance issues was held between 20 and 30 September 2011.
- 2.2 The Council requested that the examination be suspended to allow further work to be carried out to address the acknowledged deficiencies in the Core Strategy and the Inspector agreed to this request. His decision is set out in a letter - a copy of which is available on the Council's Website EIP page.
- 2.3 The Inspector's Ruling set out the following three topics to be addressed at a reconvened EIP:
 - (i) The strategic approach to Green Belt releases;
 - (ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt;
 - (iii) The overall scale of housing development over the plan period
- 2.4 The Council completed further evidence base work between October and December 2011 and agreed to propose changes to the Core Strategy to address the topics raised by the Inspector.
- 2.5 A full set of Proposed Changes to the Core Strategy and the background documentation were published on the Council's website on 19 December 2011 and letters sent to all parties on the LDF database in accordance with the agreed timetable.
- 2.6 Press notices were published in all the local newspapers in the New Year publicising the consultation period of six-weeks between 5 January and 15 February 2012. The documents were made available to view at 'Access Selby' and all local libraries.
- 2.7 A separate statement (an Addendum to the Consultation statement) provides more details of the consultation undertaken relating to the Proposed Changes to the Submission Draft Core Strategy..

3. Consultation Responses to the Proposed Changes

General Information

- 3.1 39 individuals and organisations have submitted comments to the Proposed Changes. 26 of those had already made representations in response to the Publication Core Strategy whilst 13 individuals and organisations have made comments for the first time.
- 3.2 182 representations were received during the 6 weeks consultation period. Table 1 below summarises the number of representations received for each Proposed Change / policy of the Core Strategy.
- 3.3 At the time of writing, no representations were received outside the consultation period.

Table 1 Numbers of Representations relating to Proposed Changes

Proposed Change	Policy / Para	Issue	Number of Representations
GENERAL			
General	-		10
General PC1.9	Para 4.3	Legal Compliance and Duty to Cooperate	8
All Proposed Changes	-	Procedural Matters – Legal Compliance	3
POLICY CPXX GREEN BELT			
PC5.6	CPXX	New Policy Green Belt	24
POLICY CP1			
PC5.4	Para 4.19	Population figures	6
PC5.9	CP1	Reference to Green Belt	1
POLICY CP2			
PC5.10	Para 5.4	Increased scale of housing / phasing	5
PC5.14	Para 5.17	Distribution of housing between LSCs	5
PC5.15	Para 5.18	Distribution of housing between LSCs	6
PC5.17	Para 5.20	Distribution to DSVs	4
PC5.20	Para 5.24	Footnote - rounding of figures	1
PC5.26	Policy CP2	Rounding of figures in policy	3
PC5.26	Policy CP2	General	4

Proposed Change	Policy / Para	Issue	Number of Representations
PC5.26	Policy CP2	Scale of Housing	20
PC5.33	Para 5.43	Scale of housing	1
PC5.26	CP2	Distribution	27
PC5.26	CP2	Phased Delivery	11
PC5.30	Para 5.40	Phasing	4
PC5.34	Para 5.43	Phasing	1
PC5.26	CP2	Base Date	1
PC5.26	CP2	Plan Period	3
PC5.26	CP2	Plan Period / Employment	1
POLICY CP3			
PC5.36	Paras 5.44 – 5.52	New text for revised Policy CP3	4
PC5.37	CP3		10
POLICY CP7			
PC5.40	CP7	Reference to Green Belt policy	2
POLICY CP9			
PC4.24	CP9	Criterion (ix)	3
PC5.42	CP9	Employment land requirements	3
OTHER DOCUMENTS			
BP14	-	Evidence for CP2 and CP3	1
Various BP's	-	Non-designation of Escrick as DSV	1
SA Addendum	-	General	2
SA Addendum	-	Green Belt / Consideration of housing options	6
Appropriate Assessment	-	General	1
TOTAL			182

3.4 Table 2 below sets out how many of the 182 representations considered that the Core Strategy was legally compliant and sound/unsound, although it should be noted that many respondents did not specify whether they considered the document to be legally compliant or sound/unsound.

Table 2 Legal Compliance and Soundness		
Do you consider the Proposed Changes are legally compliant?		
Yes	No	Not Specified
36	44	102
Do you consider the Proposed Changes are sound?		
Sound	Unsound	Not Specified
12	149	21

3.5 Table 3 outlines the number of representations made against each test of soundness, bearing in mind that consultees were able to select more than one test of soundness when making representations. In such cases consultees were asked to complete a separate sheet for each test of soundness they considered a policy, paragraph or other part of the Core Strategy to fail on, although many respondents did not or were unable to indicate which of the 3 main tests applied.

Table 3 Number of Reps Made Against Each Test of Soundness			
Do you consider the Proposed Changes are unsound because not:			
Justified	Effective	Consistent with National Policy	Not Stated
67	55	25	35

3.6 A full set of representations has been submitted to the Inspector and they are also available on-line at www.selby.gov.uk.

3.7 The key issues raised by the representations are summarised in the following sections based on individual topics.

4. Key Issues Raised

General and Legal Compliance Issues

4.1 10 general / 'no comments' representations were received. There were 11 individual representations from 6 individuals concerning procedural matters and the 'Duty to Cooperate'.

(i) The strategic approach to Green Belt releases

4.2 24 representations were received relating to Green Belt issues. Although 2 objected to the principle of the Green Belt policy (the review) 10 supported the introduction of the proposed new policy in principle. 9 objected to the detailed wording and 3 provided general comments.

4.3 Some of the issues raised were:

- The Green Belt has been established for a long time and is due for review
- Introduction of the new policy at a late stage in the process
- Goes beyond a localised review
- Triggers for a review are unclear and/or wrong
- Non-Green Belt land should come forward before Green Belt land
- Safeguarded land should / should not be considered as part of a review
- Need to refer to review of Major developed Sites in the Green Belt
- Cross-boundary issues

(ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt and;

(iii) the overall scale of housing development over the plan period

4.4 97 representations were received relating to the revised Policy CP2 which deals with the overall scale and distribution of growth. There is overall support for the proposed increase in the scale of growth in principle. 21 representations considered the scale however was incorrect and should be even greater.

4.5 42 representations objected to the proposed distribution of housing growth between settlements set out in CP2. 16 representations were received objecting to the 'phasing' in CP2. 4 supported an extension to the 'plan

period' but suggested it should be longer than to 2027.

4.6 14 representations objected to the detail of revised CP3 (housing delivery mechanisms) although some of these objections related to the revised scale of housing not the delivery mechanisms.

4.7 The key issues raised were:

- The annual housing requirement should be higher - figures put forward range from 465dpa – 550dpa based on the 2008 population/household projections not the 2004 and related objections to the evidence base relied upon and assumptions made.
- 'Phasing' should be deleted and a constant annual target figure used.
- The plan period should be longer (to 2028 or 2029) to align with other local authorities and the expected adoption of the SADPD.
- The split between the two Local Service Centres of Tadcaster and Sherburn in Elmet should be different to that proposed with alternative figures and strategies proposed.
- Some consider that because of constraints in Tadcaster the requirement should be accommodated elsewhere instead - variously in Selby, transferred to Sherburn in Elmet or other DSVs.
- Suggestions are made about alternative wording to the specific criteria in Policy CP3.

Other representations

4.8 A small number of other representations relate to the other Proposed Changes including CP9 (employment/mine sites) and other supporting text. In addition 11 representations relate to the Sustainability Appraisal, Appropriate Assessment, SHLAA and other evidence base.